



Huntington Breast Cancer Action Coalition, Inc
746 New York Avenue
Huntington, NY 11743
Phone: (631) 547-1518 Fax: (631) 547-1520
friends@hbcac.org www.hbcac.org

The Honorable Jaclyn A. Brillig
Secretary
New York State Public Service Commission
Agency Building 3
Empire State Plaza
Albany, NY 12223-1350

Re: Case 03-E-0188, Covanta Petition to Include Garbage Incineration (Waste-to-Energy) in New York's Renewable Portfolio Standard Program.

Dear Secretary Brillig:

Huntington Breast Cancer Action Coalition, Inc is writing to express our opposition to Covanta Energy's petition to include garbage incineration as an eligible technology for inclusion in the state's Renewable Portfolio Standard (RPS). We are a non-profit grassroots organization dedicated to the ultimate eradication of breast cancer through education and awareness. Our mission is to focus on prevention methods while actively helping those who are faced with a positive diagnosis.

The goal of the RPS is to promote clean energy technologies with the least adverse environmental impacts. Garbage incineration (waste-to-energy) does not meet that goal. The Public Service Commission (PSC) should focus the state's limited financial resources on encouraging the production of renewable energy from clean resources rather than subsidizing major polluting facilities like garbage incinerators.

Municipal solid waste (MSW) is not a renewable source of energy. While the state's policy goal is to minimize solid waste through waste prevention, recycling and reuse, incinerators require a steady supply of garbage to burn as fuel. New York's current solid waste management plan sets a goal of reducing solid waste by 86% by 2030. The plan does not support including garbage incineration as renewable energy. On the contrary, it recognizes that capturing the embedded energy of materials by recycling or composting them saves far more energy than incineration recovers. The state's current energy policy also does not support classifying garbage incineration as renewable.

Mixed MSW is a very dirty and inefficient fuel source. In addition to generating large quantities of ash that must be disposed of and releasing highly toxic emissions such as dioxin and mercury into the air, garbage incinerators release far more carbon dioxide emissions than coal plants.

Incinerators are also extremely expensive to build and to operate. Allowing garbage incineration to be eligible for the RPS could drain substantial resources away from solar, wind and other clean renewable energy sources and thus adversely impact the state's ability to meet its clean energy goals. The PSC has repeatedly rejected the inclusion of garbage incineration in the RPS because of its adverse environmental impacts. There is no new information in Covanta's petition that merits a change in that position.

We therefore urge the PSC to deny Covanta's petition to include garbage incineration in the Renewable Portfolio Standard.

Sincerely,

Karen Joy Miller
Huntington Breast Cancer Action Coalition, Inc

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